

EXHIBIT 24

Thomas M. Milton

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Master File No. 1:00-1898
MDL No. 1358 (SAS)
M21-88

In re: Methyl Tertiary Butyl Ether,)
("MTBE") Products Liability Litigation)

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VIDEOTAPED DEPOSITION OF THOMAS M. MILTON

WASHINGTON, D.C.

March 30, 2007

The videotaped deposition of THOMAS M. MILTON
was convened on Thursday, March 30, 2007,
commencing at 9:01 a.m., at the offices of
McDermott Will & Emery, 600 Thirteenth Street,
N.W., 12th Floor, Washington, D.C. 20005, before
Paula G. Satkin, Registered Professional
Reporter and Notary Public.

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Job No. 1-100234

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1 measured the amount of product you had in the
2 tank versus the amount of product that you sold
3 and reconciled it against the amount of product
4 that you bought.

5 Q. Inventory reconciliation?

6 A. Inventory reconciliation.

7 Q. Did Mobil use any other method
8 with their underground storage tanks to
9 determine if tanks were leaking?

10 MR. BONGIORNO: I won't call this
11 an objection, but if you could help the witness
12 with the time frame?

13 BY MS. SANCHEZ:

14 Q. If you would like to go from the
15 early 1980s, if they changed do you want to do
16 it by time? Would that be easier for you?

17 A. Narrow it down a little bit for me
18 if you can.

19 Q. Sure. What methods of leak
20 detection did Mobil use in the early 1980s?

21 A. In the early 1980s it was
22 primarily the inventory control.

23 Q. You stated primarily. Were there
24 other methods that they also used?

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1 A. Let me restate that. It was
2 inventory control in the early 1980s.

3 Q. What type of methods did they use
4 for leak detection in the late 1980s?

5 A. As the '80s progressed and the --
6 we started looking at the new equipment,
7 fiberglass tanks came into play in the early
8 '80s, late '70s.

9 There was some new leak detection
10 equipment being produced, electronic leak
11 detection systems for lines.

12 There was some leak detection
13 equipment that was also developed for tanks.

14 None of it worked very well
15 initially because it was in the early stages of
16 it so we were still relying primarily on
17 inventory control, but we started to experiment
18 somewhat with some electronic systems.

19 Q. Did Mobil use different methods of
20 leak detection devices in the early 1990s?

21 A. It was still primary inventory
22 control and the electronic systems were getting
23 improved better, better developed by the
24 suppliers and we started using those in